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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

(HONORABLE MARILYN L. HUFF)

11 UNITED STATES OF AMERICA,) Criminal Case No. 07-CR-02605-H
12 Plaintiff,) Date: January 28, 2008
13 v.) Time: 2:00 P.M.
14 EDWARD DOUGLAS,)
15 Defendant.)

**NOTICE OF MOTION AND
MOTION FOR DISCOVERY**

17 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
LUELLA MENDOZA CALDITO, ASSISTANT U.S. ATTORNEY

19 PLEASE TAKE NOTICE that on January 28, 2008, at 2:00 P.M., or as soon thereafter as
20 counsel may be heard, defendant EDWARD DOUGLAS, by and through his counsel, Ricardo
21 M. Gonzalez, will respectfully move the Court for an order to grant the motion as set forth
22 below.

MOTION

24 Defendant EDWARD DOUGLAS, by and through his counsel, Ricardo M. Gonzalez,
25 hereby moves this Court, pursuant to Rules 12 and 16 of the Federal Rules of Criminal
26 Procedure, the *Jencks Act* (18 U.S.C. § 3500), *Brady v. Maryland*, 373 U.S. 83 (1963), and its
27 progeny, the Fourth, Fifth, and Sixth Amendments to the Constitution of the United States, and
28 the general supervisory powers of this Court, for an Order compelling the Government to

1 disclose, or in the case of tangible evidence, to produce for inspection and copying, all evidence
2 and information in the possession, custody or control of the Government which may be favorable
3 to the defendant, or material on the issue of guilt or innocence, or which could lead to material
4 evidence, or evidence or information which could be useful in the examination of witnesses at
5 trial; and for disclosure and inspection of the information requested in the attached memorandum
6 of points and authorities.

7 This motion is based upon this notice of motion, the accompanying memorandum of
8 points and authorities, the records and files in the instant case, and on any and all other matters
9 that may be presented to this Court prior to or at the time of the hearing of this motion.
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11 Dated: January 28, 2008
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13 *s/Ricardo M. Gonzalez*
14 RICARDO M. GONZALEZ
15 Attorney for Defendant
16 Edward Douglas
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